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*Attorneys for Defendant*  
COUNTY OF SAN JOAQUIN

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

AISHA JAMILAH TIGGS, individually and  
as co-successor in interest to Decedent  
MARCUS CRUMB, et al.,

Plaintiffs,

vs.

COUNTY OF SAN JOAQUIN, a public  
entity, et al.,

Defendants.

No. 2:22-cv-2163 KJM DB

**JOINT STIPULATION FOR COURT  
ORDER TO T-MOBILE FOR RELEASE  
OF PHONE RECORDS; AND ORDER**

Plaintiffs, by and through their counsel of record, and Defendants, by and through their  
counsel of record (“the parties”), having met and conferred, hereby respectfully make the  
following stipulated request to the Court:

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*Aisha Jamilah Tiggs, et al. v. County of San Joaquin, et al.*  
Joint Stipulation for Court Order to T-Mobile for Release of Phone Records  
Case No. 2:22-cv-02163-KJM-DB

**THE PARTIES STIPULATE AND AGREE AS FOLLOWS:**

WHEREAS, at the time that relevant events that gave rise to this action occurred, and at the time relevant phone calls germane to the events at issue in this case were made – between 11/01/21-12/01/21 – by Plaintiff Aisha Jamila Tiggs, the phone calls were made from what is referred to by cellular service providers for identification purposes (when records are sought) as T-Mobile “target telephone number” (209) 390-3876, which was a prepaid billing account;

WHEREAS, Plaintiff Aisha Jamila Tiggs previously attempted to procure her own phone records, but her requests were denied, and she was told the records would not be released without a subpoena;

WHEREAS, per the Legal and Emergency Response division at T-Mobile:

“A court order is required for release of subscriber information associated with a CA, DE or PA prepaid account. In regard to identifier(s) 2093903876, The target telephone number is associated with a CA, PA or DE prepaid account. COURT ORDER REQUIRED FOR RELEASE OF RECORDS.”

ACCORDINGLY, the parties hereby make a STIPULATED REQUEST that the Court issue an Order commanding T-Mobile to – within **21-days** of service by U.S. Mail of the Court’s Order on the Legal and Emergency Response division of T-Mobile, at 4 Sylvan Way, Parsippany, N.J. 07054 – release to Plaintiffs’ undersigned counsel any and all records pertaining to target telephone number **(209) 390-3876**, ranging from November 1, 2021 to December 1, 2021, including, but not limited to, telephone records, call logs, text message records, and text message logs.

The parties further stipulate that any relevant and discoverable records that are produced to Plaintiffs shall be produced to Defendants.

**IT IS SO STIPULATED.**

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1 Dated: January 30, 2024

**LAW OFFICE OF SANJAY S. SCHMIDT**

2 /s/ Sanjay S. Schmidt

3 By: SANJAY S. SCHMIDT

4 Attorneys for Plaintiffs

5 Dated: January 30, 2024

**PORTER SCOTT  
A PROFESSIONAL CORPORATION**

6 /s/ Suli A. Mastorakos

7 By: Carl L. Fessenden

8 Suli A. Mastorakos

9 Attorneys for Defendant

10 COUNTY OF SAN JOAQUIN

11 **ORDER**

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13 Having read and considered the parties' foregoing stipulation, GOOD CAUSE having  
14 been shown, the foregoing stipulation is GRANTED, and it is HEREBY ORDERED THAT:  
15 Within **21-days** of service by U.S. Mail of this Order on the Legal and Emergency Response  
16 division of T-Mobile, at 4 Sylvan Way, Parsippany, N.J. 07054 –T-Mobile is ORDERED to  
17 release to Plaintiffs' undersigned counsel any and all records pertaining to target telephone  
18 number **(209) 390-3876**, ranging from November 1, 2021 to December 1, 2021, including, but  
19 not limited to, telephone records, call logs, text message records, and text message logs. Any  
20 relevant and discoverable records that are produced to Plaintiffs shall be produced to Defendants.

21 **IT IS SO ORDERED.**

22 DATED: February 13, 2024

/s/ DEBORAH BARNES

23 UNITED STATES MAGISTRATE JUDGE